

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

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In re: : Chapter 11  
: Case No. 08-35653-KRH  
CIRCUIT CITY STORES, INC., et al. :  
: Jointly Administered  
Debtors. : Judge Kevin R. Huennekens  
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**MOTION FOR ADMISSION OF DAVID M. HILLMAN *PRO HAC VICE***

J.R. Smith (the “Movant”), a member in good standing of the Bar of the State of Virginia, an attorney admitted to practice before the United States Bankruptcy Court of the Eastern District of Virginia, and an attorney with the Richmond, Virginia office of the law firm of Hunton & Williams LLP, hereby moves (the “Motion”) the Court to enter an Order permitting David M. Hillman, an attorney with the New York, New York office of the law firm of Schulte Roth & Zabel LLP (the “Admittee”), to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, to represent Panasonic Corporation of North America, pursuant to Rule 2090-1(E)(2) of the Local Rules of

J.R. Smith [VSB # 41913]  
HUNTON & WILLIAMS LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219-4074  
Telephone: (804) 788-8200  
Facsimile: (804) 788-8218

and

David M. Hillman [NY Bar No. DMH 8666]  
SCHULTE ROTH & ZABEL LLP  
919 Third Avenue  
New York, NY 10022  
Telephone: (212) 756-2000  
Facsimile: (212) 593-5955

Counsel for Panasonic Corporation of North America

the Bankruptcy Court of the Eastern District of Virginia (the “Local Rules”) in the above-captioned proceeding. In support of the Motion, the Movant states as follows:

1. The Admittee is a member in good standing of the Bar of the State of New York.

The Admittee is admitted to practice before the United States Courts of Appeals for the Second and Sixth Circuits and United States District and Bankruptcy Courts for the Southern and Eastern Districts of New York. There are no disciplinary proceedings pending against the Admittee. The Admittee understands that if he is admitted *pro hac vice*, he will be subject to the disciplinary jurisdiction of this Court.

2. Movant requests that the Court allow the Motion so that the Admittee may file pleadings and appear and be heard at hearings in this chapter 11 case in accordance with the requirements of Local Rule 2090-1(E)(2).

3. The Movant respectfully requests that this Court treat this Motion as a written memorandum of points and authorities or waive any requirement that this Motion be accompanied by a written memorandum of points and authorities as described in Local Rule 9013-1(G).

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4. Notice of this Motion has been provided to the Office of the United States Trustee for the Eastern District of Virginia, Richmond Division, counsel to the above-captioned debtors, and counsel to the creditor's committee. Due to the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.

Dated: December 3, 2008  
Richmond, Virginia

/s/ J.R. Smith

J.R. Smith [VSB # 41913]  
**HUNTON & WILLIAMS LLP**  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia  
Telephone: (804) 788-8200  
Facsimile: (804) 788-8218

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David M. Hillman [NY Bar No. DMH 8666]  
**SCHULTE ROTH & ZABEL LLP**  
919 Third Avenue  
New York, New York 10022  
Telephone: (212) 756-2000  
Facsimile: (212) 593-5955

COUNSEL FOR PANASONIC  
CORPORATION OF NORTH AMERICA

**CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2008, a true and complete copy of the foregoing was filed and served electronically using the Court's ECF System and was sent by first class mail, postage prepaid, to the entities at the addresses indicated below:

McGuireWoods LLP  
World Trade Center  
101 West Main Street, Suite 9000  
Norfolk, VA 23510-1655  
Attn: Douglas M. Foley, Esq.

McGuireWoods LLP  
One James Center  
901 East Cary Street  
Richmond, Virginia 23219  
Attn: Dion W. Hayes, Esq.

Skadden Arps, Slate Meagher & Flom LLP  
One Rodney Square  
Box 636  
Wilmington, Delaware 19899  
Attn: Gregg Galardi, Esq.

Attorneys for Circuit City Stores, Inc.

Office of the United States Trustee  
701 E. Broad Street, Suite 4304  
Richmond, VA 23219  
Attn: Robert B. Van Arsdale, Esq.

Lynn L. Tavenner, Esq.  
Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, VA 23219

Counsel to the Creditor's Committee

/s/ J.R. Smith